

138954

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 8th & Walnut Sts.
Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection

FIKE Chemicals, Inc.
WVD 047989207
Nitro, West Virginia

DATE: Oct 4, 1984

FROM: *DD* Douglas A. Donor, Environmental Scientist
RCRA Enforcement Section (3HW11)

(20)

TO: File

Thru: *pt* Peter W. Schaul, Chief
RCRA Enforcement Section (3HW11)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE
VIOLATIONS.

*WVAPCC inspection and order to Desist
opening Burning of Hazardous Waste.*

EPA
EXHIBIT
NO. 20

AR100500



WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION
1538 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3288
MEMORANDUM

TO: Carl G. Beard, II
Director

FROM: Freddie A. Sizemore
Chief, Hazardous Waste Division

DATE: June 15, 1984

SUBJECT: Fike Chemicals, Inc.
Region IV, Regulation XXV

AREA ENGINEER'S
RECEIVED
JUN 15 1984

During a staff inspection of Fike Chemicals at Nitro on June 14th open burning of waste materials was observed. APCC staff present were Dennis Hanshew, Alfred Azevedo and Arthur Smith. They reported to this engineer that sodium amide, NaNH_2 , was being disposed of at the facility by puncturing the material holding drum and allowing the NaNH_2 to react with water. Wood pallets contaminated with chemicals of unknown nature were also being burned.

Open burning of NaNH_2 waste, a hazardous waste, is prohibited pursuant to Section 6.02 of Regulation XXV. This engineer issued a notice of violation to Fike Chemicals on June 14th concerning this matter.

Freddie A. Sizemore
Freddie A. Sizemore
Chief, Hazardous Waste Division

Date: 6-15-84

FAS/ks

AR100501



**WEST VIRGINIA
AIR POLLUTION CONTROL COMMISSION**
1558 Washington Street, East
CHARLESTON, WEST VIRGINIA 25311
TELEPHONE: 348-2275 OR 348-3286

June 14, 1984

HAND DELIVERED

Fike Chemicals, Inc
c/o Mr. Elmer Fike, President
P.O. Box 546
Nitro, WV 25143

RE: NOTICE OF VIOLATION

Dear Mr. Fike:

On June 14, 1984, an inspection was made of your facility by the Engineering and Compliance personnel of this agency. That inspection confirms that the Fike Chemicals, Inc. located at Nitro, West Virginia, is in violation of Chapter 20, Article 5E, of the Code of West Virginia, and is in violation of the West Virginia Air Pollution Control Commission's Regulation XXV - "To Prevent and Control Air Pollution from Hazardous Waste Treatment, Storage, or Disposal Facilities", in particular, Section 6.02, of said regulation, by conducting open burning of hazardous waste including but not limited to sodium amide, NaNH_2 , a waste which exhibits the hazardous waste characteristic of reactivity.

This notice confirms the verbal discussion between Mr. Carl G. Beard, II, Director and Mr. Elmer Fike, on June 14, 1984.

Freddie A. Sizemore

Freddie A. Sizemore
Chief, Hazardous Waste Division

cc: Carl G. Beard, II
Director

Mark Casdorph
Enforcement, WV DNR

Doug Donor
Enforcement, US EPA

AR100502

MEMORANDUM

TO: Robert L. Weser, P.E.
Chief of Compliance Division

FROM: Dennis H. Hanshew
Engineer I

DATE: June 19, 1984

SUBJECT: Fike Chemicals - Open burning on 6/14/84
Region IV Regulation VI and XXV

WMA COMPLIANCE SECTION
RECEIVED
AUG 29 1984

On 6/14/84 at 9:00 AM, Mr. Fike was called, concerning complaints of open burning (attached). Mr. Fike replied that he was burning some old pallets, some of which had some aromatic chemicals on them causing black smoke. He also stated that there may be some tires in the fire. Mr. Fike said that he was under a clean-up schedule with EPA and he was trying to meet a dead-line. Also, a barrel of sodium amide (NaNH_2 , also known as sodamide) had been on fire.

At 10:00 AM, Dennis Hanshew, Alfred Azevedo, both engineers with WVAPCC and Arthur Smith, chemist for WVAPCC, arrived at Fike Chemicals. A billowing cloud of gray smoke was visible from the highway. Upon closer investigation of the source of the fire, the following partial list of refuse was found burning:

- wood;
- wire casings and/or conduit; and,
- assorted metal drums - contents unknown.

Mr. Fike asked if we (WVAPCC) wanted him to put the fire out. I replied that putting the fire out would be in his (Mr. Fike's) best interest. Mr. Fike then had his people dump dirt on the fire with an endloader, while using a garden hose to help extinguish the fire.

Mr. Fike again related that he was attempting to clean the plant by order of EPA. Neither Mr. Fike nor his lawyer had received the clean-up schedule from EPA at the time of the inspection but it was expected to be delivered at any time. A copy of the schedule was requested for WVAPCC upon its arrival. Mr. Fike had written down a partial list of the clean-up program, including:

- disposing of the NaNH_2 ,
- cleaning the Na bunkers,
- securing 9 sample drums, and
- cleaning prepacking all leaking drums and place them in the diked area.

Concerning the NaNH_2 , Mr. Fike was taking the 55 gallon drums of NaNH_2 and spreading the contents on the ground. The purpose for this is to let NaNH_2 react with the available moisture in the air to form NaOH and ammonia. The caustic is then cleaned up and the ammonia is released to the atmosphere. Per Mr. Fike, the normal handling procedures for NaNH_2 was to puncture the drums several times and let it set for approximately 6 months, absorbing moisture over that time period.

AR100503

Fike Chemicals - Open burning

6/19/84

Page Two

The reason for the NaNH_2 fire early that morning was because a "hot" drum of NaNH_2 had been opened. "Hot" meaning that when the contents of the drum was spread on the ground, a spontaneous fire started because of the reaction between Na and H_2O . Mr. Fike said that he took a rake and mixed dirt into the NaNH_2 and put the fire out just a few minutes after it started. There were 4 more drums of NaNH_2 to be decomposed of in this manner.

The following people were named by Mr. Fike, concerning EPA's clean-up schedule:

Bruce Byrd - lawyer (215) 597-9100

Walter Lee - EPA chemist (215) 597-9405

Kermit Rader - Hazardous Waste Management lawyer

Mr. Potoka

Mr. Byrd is supposed to visit Fike Chemicals on June 19 and July 3, 1984, and head dioxane testing on the plant grounds.

A small reservoir covered with a plastic tarp was observed near the sodium bunkers. When questioned about its contents, Mr. Fike said that it contained waste water, cyanide, and phenols, among some other compounds. The reservoir had been constructed originally to treat these compounds, but EPA ordered its use discontinued and will not allow the water to be treated nor disposed of at this time - per Mr. Fike.

Mr. Fike was informed that his burning of refuse violated WVAPCC's Regulation VI and was given a copy of said regulation. Several photographs of the burning refuse were taken, as well as the NaNH_2 barrels. Attached are complaints received because of Mr. Fike's burning activities.

Fike Chemicals was issued an NOV for open burning of refuse and an NOV for burning hazardous waste (NaNH_2). Copies are attached.

SIGNED: _____

Dennis H. Hanshew
Dennis H. Hanshew
Engineer I

DATE: _____

6/21/84

DHH:jbv

Attachments

AR100504